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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

In Re Subpoena Of
Top Rank, Inc. and Robert Arum

Cung Le, Nathan Quarry, and Jon Fitch, on behalf of themselves and all others similarly situated,

Plaintiffs.

V.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant

Case No.: 2:15-cv-01045-RFB-PAL

**PLAINTIFFS' MOTION FOR
LEAVE TO LODGE MATERIALS
UNDER SEAL RE PLAINTIFFS'
REPLY IN SUPPORT OF MOTION
TO COMPEL PRODUCTION OF
DOCUMENTS RESPONSIVE TO
THEIR SUBPOENA TO THIRD
PARTY TOP RANK, INC. AND
MOTION TO COMPEL
ATTENDANCE AT DEPOSITION
OF ROBERT ARUM, PRESIDENT
OF TOP RANK, INC.**

Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(a), and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued by this Court on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated (collectively, “Plaintiffs”) hereby move this court for leave to lodge certain documents under seal related to their Reply in Support of Motion to Compel Production of Documents Responsive to Their Subpoena to Third Party Top Rank, Inc. and Motion to Compel Attendance at Deposition of Robert Arum, President of Top Rank, Inc. (the “Reply Brief”).

Under Section 14.3 of the Protective Order, documents designated Confidential or Highly Confidential –Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court, the Party claiming protection shall file motion to seal setting forth the bases for sealing and proper authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some other applicable authority.” Accordingly, Plaintiffs seek leave to lodge the following documents under seal. Following expiration of the twenty-one day period provided for in Section 5.2(b) of the Protective Order, a motion to unseal portions of the Reply Motion shall be filed.

First, Plaintiffs seek leave to lodge under seal portions of the Reply Brief which contain materials that have been designated as confidential.

Second, Plaintiffs seek leave to lodge under seal Exhibits 2-15 of their Reply Motion, which contain a discovery response provided by Defendant Zuffa, LLC, and deposition transcript excerpts which have been marked confidential, highly confidential, or are still in the period of review pursuant to Section 5.2(b) of the Protective Order.

Plaintiffs have filed all of these documents under seal, in accordance with the Court’s ECF system, with the instant Reply Motion. Plaintiffs have publicly filed

1 placeholders for redacted versions of these documents with the Court, and will serve un-
2 redacted versions of these documents on Defendant.

3 DATED: August 31, 2017.

4 WARNER ANGLE HALLAM JACKSON
5 & FORMANEK PLC

6 By: /s/ Robert C. Maysey

7 Robert C. Maysey
8 Attorney for Plaintiffs

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2 **CERTIFICATE OF SERVICE**
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4 I hereby certify that on August 31, 2017, I electronically transmitted the
5 PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL RE
6 PLAINTIFFS' REPLY IN SUPPORT OF MOTION TO COMPEL PRODUCTION OF
7 DOCUMENTS RESPONSIVE TO THEIR SUBPOENA TO THIRD PARTY TOP RANK,
8 INC. AND MOTION TO COMPEL ATTENDANCE AT DEPOSITION OF ROBERT
9 ARUM, PRESIDENT OF TOP RANK, INC. to the Clerk's Office using the CM/ECF
10 System for filing and transmittal of a Notice of Electronic Filing to all registered users, and
11 also served the same by mailing a copy of the redacted filings via certified mail on the
12 following, who are not registered participants of the CM/ECF System:
13

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20 *and Robert Arum*
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22 /s/Teresa Baldridge
23 Teresa Baldridge, an Employee of Warner
24 Angle Hallam Jackson & Formanek PLC
25
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